UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

C.A. No. 05-11169

| DAWN THOMPSON, on behalf of herself and all others similarly situated, Plaintiff, |) |
|------------------------------------------------------------------------------------|----|
| , | í |
| v. | į́ |
| WYETH, INC., a/k/a WYETH COMPANY |) |
| f/k/a American Home Products Corporation, |) |
| WARNER-LAMBERT COMPANY, |) |
| PARKE-DAVIS, a Division of |) |
| Warner-Lambert Company, |) |
| PFIZER, INC., MCNEIL-PPC, INC., | ĺ |
| NOVARTIS CORPORATION, NOVARTIS |) |
| CONSUMER HEALTH, INC., RITE-AID | ì |
| CORPORATION, PRESTIGE BRAND, INC., |) |
| and THE PROCTOR AND GAMBLE |) |
| COMPANY, |) |
| Defendants. | ĺ |

CERTIFICATE OF WENDY M. ERTMER PURSUANT TO LOCAL RULE 83.5.3(b) IN SUPPORT OF MOTION FOR PERMISSION TO APPEAR PRO HAC VICE

I, Wendy M. Ertmer, hereby certify:

I am a member of the firm of Covington & Burling. I submit this Certificate pursuant to Local Rule 83.5.3(b) of the Local Rules of the United States District Court for the District of Massachusetts for the purpose of appearing pro hac vice in this action as counsel for defendant The Procter & Gamble Company.

I was admitted to practice in the State of Illinois in 2003 and in the District of Columbia in 2004. I am a member in good standing in every jurisdiction where I have been admitted to practice.

There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.

I have read and am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

My application to practice in this Court is on motion of a member of the bar of this Court, Edwin F. Landers, Jr., who has entered an appearance as co-counsel herein.

I hereby certify under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Wend M Estan

COVINGTON & BURLING 1201 Pennsylvania Ave., N.W. Washington, D.C. 20004

(202) 662-6000

Dated: July 7, 2005